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January 30, 2001

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VIA U.S. MAIL

Leslie Lehnert
United States Department of Justice
1425 New York Avenue, NW
Suite 13073
Washington, D.C. 20005

Re: **Wheeling-Pittsburgh Steel Corporation ("WPSC") Multi-Media
Status**

Dear Leslie:

As per our agreement, enclosed please find the revised ISO 14001/EMS Implementation Schedule. Also enclosed are a Yorkville Plant Wastewater Project Implementation Schedule and an updated Multi-Media Task Items status report. Please be advised that some revisions to the Task Items schedule have become necessary, mainly as a result of WPSC's filing for bankruptcy court protection. For example, following the bankruptcy filing, WPSC has had difficulty retaining certain contractors and, in addition, has decided to perform some of the work itself. Schedule changes are shown in bold print on the Task Items report.

Please contact me if you have any questions.

Sincerely,


Kenneth S. Komoroski

KSK:kbs
Attachment

cc: Steve Sisk, USEPA (w/att.)
Bud Smith, WPSC (w/att.)
M. Berman, USEPA (w/att.)

PI-646308 v1 0197340-0704

WHEELING-PITTSBURGH STEEL CORPORATION

ISO 14001/EMS IMPLEMENTATION SCHEDULE

General

06/30/2001 Commence implementation
08/01/2001 Submit WPSC ISO 14001/EMS "Standard" to EPA for final review

Yorkville Plant and Wheeling Corporate Office

10/01/2001 Kickoff meeting
02/01/2002 Pre-assessment
04/01/2002 Registration Assessment
07/01/2002 Resolution of Non-conformances/Submittal to Registrar
08/01/2002 Certification Received (Three Year Term)
07/01/2003 Surveillance Audit
07/01/2004 Surveillance Audit
07/01/2005 Re-certification Assessment

Allenport and Steubenville Plants

09/01/2002 Kickoff meeting
01/01/2003 Pre-assessment
03/01/2003 Registration Assessment
06/01/2003 Resolution of Non-conformances/Submittal to Registrar
07/01/2003 Certification Received (Three Year Term)
07/01/2004 Surveillance Audit
07/01/2005 Surveillance Audit
07/01/2006 Re-certification Assessment

Martins Ferry and Mingo Junction Plants

08/01/2003 Kickoff meeting
12/01/2003 Pre-assessment
02/01/2004 Registration Assessment
05/01/2004 Resolution of Non-conformances/Submittal to Registrar
06/01/2004 Certification Received (Three Year Term)
06/01/2005 Surveillance Audit
06/01/2006 Surveillance Audit
06/01/2007 Re-certification Assessment

Follansbee Plant

07/01/2004 Kickoff meeting
11/01/2004 Pre-assessment
01/01/2005 Registration Assessment
04/01/2005 Resolution of Non-conformances/Submittal to Registrar
05/01/2005 Certification Received (Three Year Term)
05/01/2006 Surveillance Audit
05/01/2007 Surveillance Audit
05/01/2008 Re-certification Assessment

**WHEELING-PITTSBURGH STEEL CORPORATION
YORKVILLE PLANT
OUTFALLS 001, 002, & 003
WASTEWATER PROJECT IMPLEMENTATION SCHEDULE**

(MONTHS - STARTING 1/1/01)	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20
PHASE DESCRIPTION																				
PROCUREMENT																				
REMOVAL OF NON-STORM WATER FROM 001																				
SEWER REROUTES & MANHOLE COVER REPLACEMENTS																				
LABORATORY DEMO																				
PICKLER BASIN LINER REPAIR																				
CLEAN SEWERS																				

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January 31, 2001

WHEELING-PITTSBURGH STEEL CORPORATION MULTI-MEDIA TASK ITEMS

(Revision 1)

TASK
**ANTICIPATED
COMPLETION DATE**
(On or Before)
NOTE: ~~Start dates are rounded.~~

NOTE: Bold dates are revisions.

SPCC Issues

Submit list of Interim Measures and implementation schedule

~~02/22/2001~~

Anticipated start date for implementation of Interim Measures

~~02/22/2001~~

Complete Interim Measures

06/30/2001Revisions to existing SPCC Plans for Steubenville, Mingo Junction,
Yorkville and Martins Ferry Plants06/30/2001

Implement revisions to SPCC Plans

12/31/2001**Water Issues****Steubenville Plant****Outfall 019**

Complete Overflow and Bypass Point Study for calculated outfall 019 sewers

04/30/2001

Submit project implementation schedule

05/31/2001

Anticipated start date for project implementation

06/30/2001

Complete project implementation

12/31/2001**Outfall 008**

Anticipated start date for installation of wastewater sampling weir plate

03/31/2001

Complete installation of wastewater sampling weir plate

04/30/2001

Collect one grab sample for fecal coliform once/month for 6 months

10/31/2001

Submit final report on sampling program

12/31/2001

Water Issues (Continued)

January 31, 2001

Steubenville Plant (Continued)**Outfall 009**

Anticipated start date for installation of wastewater sampling weir plate	<u>03/31/2001</u>
Complete installation of wastewater sampling weir plate	<u>04/30/2001</u>
Collect one grab sample for pH once per month for 6 months	<u>10/31/2001</u>
Submit final report on sampling program	<u>12/31/2001</u>

Yorkville Plant**Outfalls 001 & 002**

Submit final Engineering Report on Overflow and Bypass Point Study	03/31/2001
Submit project implementation schedule	03/31/2001
Anticipated start date for project implementation	<u>03/31/2001</u>
Complete project implementation	<u>06/30/2002</u>
Complete coating of roofs previously outlined in plan submitted to USEPA & OEPA (Schedule allows for winter months exclusion)	<u>06/30/2001</u>
Complete cleaning of sewers leading to outfalls 001 and 002	<u>07/31/2001</u>

Outfall 003

Submit final Engineering Report on Overflow and Bypass Point Study	03/31/2001
Submit project implementation schedule	03/31/2001
Anticipated start date for project implementation	Revised to 05/30/2001 <u>03/31/2001</u>
Complete project implementation	<u>06/30/2002</u>

Phase II & OWS Treatment System Modifications

Submit final Engineering Report on proposed modification to treatment systems	03/31/2001
Submit Permit-To-Install Application to OEPA	<u>03/01/2001</u>
Anticipated start date for installation of modifications to treatment systems (Pending OEPA approval being obtained within six months)	<u>12/31/2001</u>
Complete modifications to Phase II and OWS wastewater treatment system	<u>11/30/2002</u>
Revised to 01/31/2003	

Water Issues (Continued)

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Yorkville Plant (Continued)

Anticipated start date for installation of #11 Mill & Pickler Entry Oil/Water separation system (Pending OEPA approval being obtained within six months)

Complete installation of #11 Mill & Pickler Entry Oil/Water separation system

11/30/2001**Martins Ferry Plant****Influent Sump Weir**

Submit preliminary engineering plans for upgrading the stormwater collection system

Submit Permit-to-Install application to OEPA

Anticipated start date for construction (Pending OEPA approval within six months)

Complete construction

02/28/200108/30/200105/31/2002**Air Issues****Follansbee Plant**

Provide documentation for completed repairs for COG desulfurization System (completed)

Obtain project approval of distributive control system for the COG desulfurization system

Place orders for major equipment for the distributive control system for the COG desulfurization system

Anticipated start date for installation of new distributive control system for COG desulfurization system

Distributive control system components tied in during fall outage

Check out and startup completed for distributive control system

Obtain spare deacidifier trays and other determined critical spare components

Install backup instrument air system

Alteration of piping supports

Revised to 10/31/01

Limit coke production to 4750 tons of coal charged to the ovens per day from May 1 through September 30 when the Ohio River water temperature is 85 degrees (F) or higher

Annual

Air Issues (Continued)

January 31, 2001

Evaluate install/upgrade ammonia liquor pump
(Determined not necessary - will be maintained as spare)

~~Completed~~

Complete termination of high voltage cables for #1 detarrer

~~Completed~~

Check out #1 detarrer/startup and commission

Revised to 03/31/01

01/31/2001

#4 detarrer will be isolated and inspected after #1 detarrer is restarted, repair schedule will be submitted by this date

04/31/2001

Submit schedule for developing and implementing COG
desulfurization system SOP for maintaining compliance with H2S standard

~~Completed~~**Steubenville Plant**

Complete modification of flame suppression lance holders at BF#1

~~Completed~~**Mingo Junction Plant**

Complete conceptual engineering for installation of replacement
scrubber fans and motors at BOF to increase draft

03/31/2001

Receipt of Permits for upgrade of new fans and motors

09/30/2001

Place order for major equipment

01/01/2002

Anticipated start date for installation of scrubber fans
and motors upgrade at BOF to increase draft

04/01/2002

Complete installation of replacement scrubber fans
and motors at BOF to increase draft

08/31/2002

Complete installation of main hood closure deflector plates for B-vessel trial

02/28/2001

Anticipated start date for installation of main hood closure deflector plates for
A-vessel (Based on trial at B vessel)

04/30/2001

Complete installation of main hood closure deflector plates for A-vessel

06/30/2001

Complete conceptual engineering of tap side enclosures

03/31/2001

Complete detailed engineering of feasible tap side enclosures

07/01/2001

Place orders for equipment for feasible tap side enclosures

07/31/2001

Anticipated start date for construction of feasible tap side enclosures

11/01/2001

Startup/check out tap side enclosures

12/15/2001

Complete modification to hot metal desulfurization hood

06/30/2001

Submit schedule for developing and implementing SOP for BOF

~~Completed~~

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Air Issues (Continued)**Martins Ferry Plant**

- Provide documentation on costs for repairs to fabric filter modules
- Conduct baghouse stack test
- Submit baghouse stack test report
- Submit schedule for developing and implementing SOP for galvanizing line

~~02/22/2001~~03/31/200104/30/2001~~Completed~~**RCRA Issues****Steubenville Complex****Coke Oven Gas Condensate**

- Modify dripleg inspection sheet
- Evaluate COG condensate transport via rail
- Complete Engineering Study regarding replacement of torpedoes
- Complete preparation of Remediation Plan regarding removal of torpedoes
- Submit project implementation schedule
- Anticipated start date for torpedo removal/remediation/replacement
- Complete torpedo removal/remediation/replacement

~~02/22/2001~~~~04/19/2001~~03/31/200103/31/200104/30/200106/30/200108/31/2002**ISO 14001/EMS Issues**

- Submit WPSC revised "standard" to USEPA (completed)
- Develop implementation schedule
- Anticipated start date for implementation of ISO 14001/EMS program
- Complete implementation of ISO 14001/EMS

~~02/22/2001~~~~04/19/2001~~06/30/200106/30/2004